

JACKLIN CHOU LEM (Cal. Bar No. 255293)
MAY LEE HEYE (Cal. Bar No. 209366)
HOWARD J. PARKER (Wash. Bar No. 07233)
KELSEY C. LINNETT (Cal. Bar No. 274547)
Antitrust Division
U.S. Department of Justice
450 Golden Gate Avenue
Box 36046, Room 10-0101
San Francisco, CA 94102-3478
Tel: (415) 436-6660; Fax: (415) 436-6687
jacklin.lem@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

SABRY LEE (U.S.A.), INC.,

Defendant.

No. CR 11-0599 RS

**STIPULATION AND
[PROPOSED] ORDER FOR
EXPEDITED SENTENCING
UNDER L.R. 32-1(b)**

DATE: September 20, 2011

TIME: 2:30 pm

COURT: Hon. Richard Seeborg

On August 30, 2011, the United States filed a one-count Information charging defendant Sabry Lee (U.S.A), Inc. ("Sabry Lee") with participating in a conspiracy to suppress and eliminate competition by fixing the prices of aftermarket auto lights sold in the United States and elsewhere, in violation of the Sherman Antitrust Act, 15 U.S.C. § 1. Sabry Lee is scheduled for a change of plea and possible sentencing on September 20, 2011. Sabry Lee will waive Indictment and plead guilty under Fed. R. Crim. P. 11(c)(1)(C). The United States and Sabry Lee have filed a Joint Sentencing Memorandum describing the material terms of the plea agreement and the agreed-upon recommended sentence. The Plea Agreement has been attached as Exhibit A to the Joint Sentencing Memorandum. The United States has also filed under seal the Declaration of

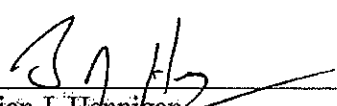
1 Jacklin Chou Lem in Support of United States' and Defendant Sabry Lee's Joint Sentencing
2 Memorandum ("Lem Declaration").


3 IT IS HEREBY STIPULATED AND AGREED as follows:

4 The United States and Sabry Lee request that the Court sentence Sabry Lee on an
5 expedited basis pursuant to Crim. L.R. 32-1(b) on September 20, 2011, the same date as the
6 scheduled change of plea hearing. The United States and Sabry Lee respectfully submit that the
7 Joint Sentencing Memorandum, the Lem Declaration, and the Plea Agreement provide sufficient
8 information for the Court to exercise its sentencing authority meaningfully without a presentence
9 report.

10
11 Dated: Sept. 6, 2011

12 Respectfully submitted,

13
14 
15 Brian J. Hennigan
16 Irell & Manella LLP
17 1800 Avenue of the Stars
Suite 900
18 Los Angeles, CA 90067-4267
Counsel for Sabry Lee (U.S.A.), Inc.

13
14 
15 Jacklin Chou Lem
May Lee Heye
Howard J. Parker
Kelsey C. Linnett
16 Trial Attorneys
17 U.S. Department of Justice
18 Antitrust Division
19 450 Golden Gate Avenue
20 Box 36046, Room 10-0101
21 San Francisco, CA 94102
22 Antitrust Division
23 (415) 436-6660

24 Based on the stipulation of the parties, and for good cause shown,

25 **IT IS SO ORDERED.**

26
27 Dated: 9/7, 2011

28 
Honorable Richard Seeborg
United States District Court Judge